
DELIVERED ELECTRONICALLY

May 11, 2021

Charles B. Cliett, Esq.
Mitchell, Williams
425 West Capitol
Suite 1800
Little Rock, Arkansas 72201

RE: Docket No. GMCB-007-21con, UnitedHealthcare of Wisconsin, Inc., Intent to Offer Medicare Advantage/Prescription Drug and Medicare Advantage only (MAPD) plans in all Fourteen Counties in Vermont.

Dear Mr. Cliett:

Thank you for your April 28, 2021 letter requesting a jurisdictional determination regarding UnitedHealthcare of Wisconsin, Inc.'s (UHC WI), a Wisconsin-domiciled health maintenance organization (HMO), intention to write Medicare Advantage/Prescription Drug and Medicare Advantage only (MAPD) in all fourteen counties (statewide) in Vermont beginning on January 1, 2022. In your submission, you included a license dated February 18, 2021 from the Vermont Department of Financial Regulation to operate in the state as a foreign health maintenance organization (HMO). The license is limited to Medicare products, and UHC WI will only offer Medicare Advantage/Prescription Drug and Medicare Advantage only (MAPD) plans statewide in Vermont.

Your letter also states that with UHC WI's proposed services in Vermont, the HMO is not a staff model HMO and does not directly provide health services through employed physicians or owned hospitals or other facilities. Instead, it contracts with independent providers and facilities and reimburses them for providing care to Medicare beneficiaries who have enrolled with the HMO. It is also represented that although UHC WI will monitor and manage care and seek to provide high quality care by its network of providers (as required under its contract with CMS), the HMO is not the direct provider of such care.

Based on the representations in your letter, the project is not subject to certificate of need review. Please notify the Green Mountain Care Board immediately if there are any future changes in the type, scope, or structure in the delivery of the services you offer, so that we may determine whether the changes are subject to review. Failure to do so as required by Green Mountain Care Board Rule 4.301(4) may result in sanctions as specified in 8 V.S.A. § 9445.



If you have any questions, please do not hesitate to contact me at (802) 760-8162.

Sincerely,

s/ Donna Jerry

Donna Jerry

Senior Health Policy Analyst

cc. Michael Barber, General Counsel
Green Mountain Care Board

